

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

Amazon.com, Inc., *et al.*

Plaintiffs,

V.

WDC Holdings LLC, *et al.*

Defendants.

Case No. 1:20-cv-484 (LO/TCB)

MOTION TO INTERVENE FOR LIMITED PURPOSES

On behalf of the non-party author of Exhibit 2 to plaintiffs’ Second Amended Complaint, the undersigned counsel moves for permission to intervene for the limited purpose of opposing the “Motion and Memorandum of Law to Require Plaintiffs to File and Serve a Partially Unredacted Copy of Exhibit 2 to the Second Amended Complaint” (the “Motion”),¹ and participating in any proceedings related to that motion, or other motions concerning the same subject matter.

The following reasons support this request. The person most affected by the Motion is the author of the email that is Exhibit 2, and whose identity movants seek to have revealed. The undersigned counsel, who represents only the author, thus is the lawyer best positioned to offer the court the fullest argument against the Motion. No lawyer currently in the case represents the author, or has advocating for the author as his or her duty. Regardless of how the Court decides the motion, our system of justice, which depends on zealous adversarial advocacy, is best served

¹ In having counsel submit this, the non-party author does not waive objections to the jurisdiction of this court over him/her.

by having the Court receive, hear, and consider arguments from the undersigned counsel in opposition to the motion. An opposition to the Motion is attached as an exhibit to this motion.

CONCLUSION

For the foregoing reasons, the non-party author of Exhibit 2 to the Second Amended Complaint respectfully request that the Court grant this motion, and receive argument from the undersigned counsel on the Motion.

Respectfully submitted,

Dated: November 10, 2020

/s/
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Counsel for the non-party author of Ex. 2

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of November, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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In addition, I will then send the document and notification of such filing (NEF) to the following party by United States Mail:

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